

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

KONINKLIJKE PHILIPS N.V. and	)	
PHILIPS LIGHTING NORTH AMERICA	)	
CORP.,	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 14-cv-12298
	)	
v.	)	JUDGE DENISE J. CASPER
	)	
WANGS ALLIANCE CORPORATION	)	
d/b/a WAC LIGHTING CO.,	)	
	)	
Defendant.	)	

**DEFENDANT WAC LIGHTING CO.'S MOTION TO COMPEL THE DEPOSITION OF  
MARC OLIVIER FLAISSIER OR IN THE ALTERNATIVE FOR APPROPRIATE  
RELIEF**

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37.1, Defendant Wangs Alliance Corporation d/b/a/ WAC Lighting Co. ("WAC") respectfully requests an order compelling Plaintiffs Koninklijke Philips N.V. and Philips Lighting North America (collectively, "Philips") to produce Marc Olivier Flaissier, named inventor on U.S. Patent 6,561,690 for deposition or in the alternative issuing appropriate sanctions. In support of its motion, WAC submits herewith a Memorandum in Support of Its Motion to Compel The Deposition of Marc Olivier Flaissier or in the Alternative for Appropriate Relief and the Declaration of Etai Lahav In Support of WAC's Memorandum in Support of Its Motion to Compel The Deposition of Marc Olivier Flaissier or in the Alternative for Appropriate Relief. WAC respectfully requests this motion be granted.

Dated: June 23, 2017

Respectfully submitted,

/s/ Etai Lahav

David C. Radulescu, Ph.D. (*pro hac vice*)  
Tigran Vardanian (*pro hac vice*)  
Etai Lahav (*pro hac vice*)  
Michael D. Sadowitz (*pro hac vice*)  
RADULESCU LLP  
The Empire State Building  
350 Fifth Avenue, Suite 6910  
New York, NY 10118  
Telephone: (646) 502-5950  
Facsimile: (646) 502-5959  
david@radulescullp.com  
tigran@radulescullp.com  
etai@radulescullp.com  
mike@radulescullp.com

***Attorneys for Defendant WAC Lighting Co.***

**CERTIFICATE OF CONSULTATION**

I, Etai Lahav, hereby certify that in accordance with Local Rules 7.1(a)(2) and 37.1(a), counsel for Plaintiffs and counsel for Defendant met and conferred regarding resolution of this motion on Tuesday, May 30, 2017 at approximately 11:00am eastern via telephone, but were not able to reach agreement.

/s/ Etai Lahav  
Etai Lahav

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Defendant WAC Lighting Co. respectfully requests oral argument regarding this motion to the extent that the Court believes that oral argument will assist it in resolving this motion.

**CERTIFICATE OF SERVICE**

I, Etai Lahav, hereby certify that a true copy of the above document was served upon counsel of record for the Plaintiff through the Court's electronic court filing (ECF) system, this June 23, 2017.

/s/ Etai Lahav  
Etai Lahav